

NOACA'S 208 PLAN CURRENT WASTEWATER FACILITY PLANNING AREA (FPA) MODIFICATION POLICIES

Water Quality Subcommittee

June 21, 2019



ACTION REQUESTED

No action is being requested. This item is for information and discussion.

PREVIOUS ACTION

Discussion item at the April 2019 Policy Committee meeting



BACKGROUND

Section 208 of the Clean Water Act

- NOACA is a Water Quality Management Agency (Governor of Ohio)
- NOACA is required to maintain and update the region's 208 Plan
- Federal wastewater permits and funding cannot conflict

Facility Planning Areas (FPAs)

- Consist of FPA boundaries and prescriptions for wastewater treatment (prescriptions)
- FPA boundaries = planning areas associated with public wastewater treatment plants (WWTPs)
- Prescriptions = local options for wastewater treatment



FPA MODIFICATIONS

FPA Boundary and Prescription Modifications

- Must be approved by NOACA's Board of Directors
- 53 FPA approved modifications since 2009
- 42% for new development

Current FPA Modification Policies

- Seven (7) policies (Chapter 4)
- Ensure consistency with 208 Plan principles
- Provide opportunity for comment from affected jurisdictions within the proposed modification area
- Guide NOACA staff, committees and Board of Directors



FPA MODIFICATION POLICES

Criteria Considered Under Current Policies

- Population forecasts
- Prescriptions
- Consensus among affected jurisdictions
- Sewer system(s) affordability and viability
- Ohio EPA permit or funding conditions
- Ability to provide sanitary sewers
- Technical feasibility
- Economic justification
- Legal authority
- Local economic harm



FPA MODIFICATION POLICIES

Not Explicitly Considered Under Current Policies

- Environmental or economic impacts related to urban sprawl
- Development vs. non-development impact of modifications
- Regional impacts (impacts beyond the modified FPAs)
- Planning documents (community master plans, watershed action plans, balanced growth plans, etc.)

Local Jurisdictions Can Apply More Stringent Wastewater Treatment Criteria with the Prescriptions for Wastewater Treatment



NEW 208 PLAN

Focus Group Relevant FPA Policy Recommendations

- FPA boundary modifications supported by local, regional or watershed planning efforts preferred (community master plans, watershed action plans, balanced growth plans, etc.)
- 5-year sewer extension timeframe (coincides with NOACA staff 5-year countywide FPA reviews)
- NOACA can consider local undue harm **against probable net benefits** of the FPA modification request
- Included an urban sprawl question in the wastewater decision makers questionnaire



WASTEWATER DECISION MAKERS QUESTIONNAIRE

NOACA staff should examine if a proposed FPA modification would further increase urban sprawl.

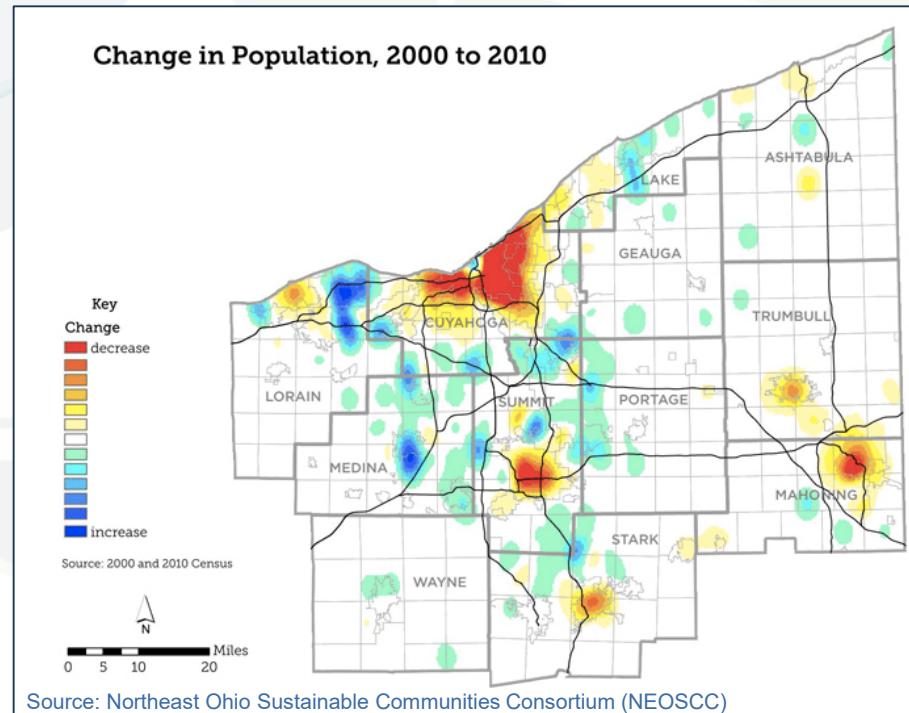
- Strongly Agree – 16%
- Somewhat Agree – 22%
- Neutral – 44%
- Somewhat Disagree – 8%
- Strongly Disagree – 10%
- 63 of 96 respondents as of June 14, 2019



POLICY COMMITTEE

Urban Sprawl FPA Modification Policy Discussion Takeaways

- Should be a consideration factor
- May or may not impact the final decision
- Board's decision to determine if urban sprawl impacts are relevant



NEXT STEPS

NOACA staff will:

- Continue to review the urban sprawl FPA policy issue;
- Develop potential criteria and structure for an urban sprawl FPA policy; and
- Present information at the July 2019 Policy Committee meeting

DISCUSSION

Water Quality Subcommittee Input Request:

- Criteria NOACA staff could or should utilize to evaluate urban sprawl and development impacts
- Needed information for the NOACA Board to determine if urban sprawl impacts are relevant
- Questions or concerns with an urban sprawl policy





NOACA will **STRENGTHEN** regional cohesion, **PRESERVE** existing infrastructure, and **BUILD** a sustainable multimodal transportation system to **SUPPORT** economic development and **ENHANCE** quality of life in Northeast Ohio.

